

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major draft No. F-03-029 (Revision 1)
BLUEGRASS STATION DIVISION, 5751 BRIAR HILL ROAD, LEXINGTON, KY 40516-9721

March 30, 2005

BRIAN BALLARD, REVIEWER

Plant I.D. # 021-067-00032

Activity ID#: APE20040003

A.I.#: 1022

CHANGES TO THE PERMIT (REVISION 1)

The descriptions for emission points 2, 3, 4, 7 and 8 are updated to reflect the installation of new control equipment. The updated descriptions are on pages 6, 8, 10, 15 and 17 of F-03-029 (Revision 1).

EP02, EP03, EP07 and EP08

For emission points 2, 3, 7 and 8 the new control equipment consists of three-stage filters contained in a three-stage filter bank. The first stage consists of polyester roll media. The second stage consists of varying numbers (by emission point) of Medium Efficiency Pleated Filter (MEPT) panels. The third stage consists of varying numbers (by emission point) of six-pocket bag filters. A control efficiency of 95% is used for purpose of calculating PM/PM₁₀ emissions. A control efficiency of 0% is used for purpose of calculating VOC emissions.

EP04

Emission point 4 is equipped with two filter sets of identical type to those used for emission points 2, 3, 7 and 8. Emission point 4 is also equipped with carbon filters located behind the third stage six-pocket bag filters. A control efficiency of 95% is used for purpose of calculating PM/PM₁₀ emissions. This source has accepted federally enforceable limits on single HAP, combined HAPs and VOCs to preclude applicability of the Aerospace NESHAP. The source has elected not to conduct an initial performance test to determine the VOC control efficiency on this control equipment. The source anticipates being able to easily comply with permit limits without taking the control efficiency into consideration. A control efficiency of 0% is used for purpose of calculating VOC emissions.

APPLICABLE REGULATIONS:

401 KAR 63:060. List of hazardous air pollutants, petition process, lesser quantity designations, and source category list.

401 KAR 63:020 – Potentially Hazardous Matter or Toxic Substances, applies to the potentially hazardous matter and toxic substance emissions from affected facilities.

401 KAR 59:010, New Process Operations, applies to the particulate matter emissions from affected facilities constructed on or after July 2, 1975.

EMISSION AND OPERATING CAPS DESCRIPTION:

Bluegrass Station Division has requested voluntary permit limits of less than 90.0 tons per year of volatile organic compounds (VOC), 9.0 tons per year of individual hazardous air pollutant (HAP) and 22.5 tons per year of combined HAPs.

PERIODIC RECORDKEEPING:

The permittee shall maintain monthly records of the purchase and usage of the paints and solvents or any VOC/HAP containing material. The permittee shall also maintain monthly records of the volume of natural gas burned. VOC/HAP emissions shall be calculated and recorded on a *monthly* basis. These records shall be summarized in tons per month VOC/HAP emissions; subsequently, tons of VOC/HAP emissions per rolling 12-month period shall be recorded. In addition, these records shall demonstrate compliance with VOC/HAP emission limitations listed herein for the conditional major limitations. These records, as well as purchase orders and invoices for all VOC/HAP containing materials, shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the Division upon request.

OPERATIONAL FLEXIBILITY: NA**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.